



Indiana Department of Environmental Management
Office of Air Quality
Rule Fact Sheet
February 6, 2002

**Particulate Matter Emissions (PM₁₀) at Union Tank Car in Lake County
#99-73(APCB)**

Overview

Establishes a new PM₁₀ emission limit for the grit blaster operation at Union Tank Car in Lake County.

Citations Affected

Amends 326 IAC 6-1-10.1.

Affected Persons

Union Tank Car and the public in the vicinity of the facility.

Potential Cost

No cost to IDEM and no additional cost to Union Tank car since they have already installed the baghouses to meet the new limit.

Description

Union Tank Car operates a railcar manufacturing facility in East Chicago, Indiana. Processes at the facility include railcar grit blasting, heat-treating, and surface coating. The area where the facility is located is classified by U.S. EPA as nonattainment for PM₁₀. Union Tank Car (UTC) has requested a state implementation plan (SIP) change for the grit blasting unit because it cannot meet its specified PM₁₀ limit with available control equipment. The original emission limit was set at a level that is not achievable by this industry. UTC has requested to change the existing SIP limit of 0.002 lbs/ton to 0.01 grains per dry standard

cubic foot (gr/dscf) and the existing limit of 0.020 lbs/hr to 9.9 lbs/hr. The unit's emission limit is being changed from a pounds per ton (lbs/ton) emission factor to grains per dry standard cubic foot (gr/dscf) because the latter is an operating parameter that can be directly monitored.

Union Tank Car has already replaced its less effective baghouses with two (2) new baghouses. The new baghouses control emissions to a more stringent level than other similar sources in Lake County. While the change in the emission limit appears to be a significant numerical increase from the existing limit, actual emissions will not increase as a result of this rulemaking and the rulemaking will not require or allow any other changes in operation at the source.

The department performed an air quality analysis of the proposed adjustment to Union Tank Car's PM₁₀ emission limits. The analysis indicates that the proposed emission limit of 9.9 lbs/hr and the grain loading factor of 0.01 grains per dry standard cubic foot (gr/dscf) will result in modeled concentrations that meet the 24-hour and annual National Ambient Air Quality Standards for PM₁₀.

Other minor wording changes are proposed to make the rules consistent within Title 326 of the

Administrative Code.

Consideration of Factors Outlined in Indiana Code 13-14-8-4

Indiana Code 13-14-8-4 requires that in adopting rules and establishing standards, the board shall take into account the following:

- 1) All existing physical conditions and the character of the area affected.
- 2) Past, present, and probable future uses of the area, including the character of the uses of surrounding areas.
- 3) Zoning classifications.
- 4) The nature of the existing air quality or existing water quality, as appropriate.
- 5) Technical feasibility, including the quality conditions that could reasonably be achieved through coordinated control of all factors affecting the quality.
- 6) Economic reasonableness of measuring or reducing any particular type of pollution.
- 7) The right of all persons to an environment sufficiently uncontaminated as not to be injurious to:
 - (A) human, plant animal, or aquatic life; or
 - (B) the reasonable enjoyment of life and property.

Consistency with Federal Requirements

The amended rules are consistent with federal laws.

IDEM Contact

Additional information regarding this rulemaking action can be obtained by calling (800) 451-6027 (in Indiana), press 0 and ask for Suzanne Whitmer, Rule Development Section, Office of Air Quality, (or extension 2-8229) or dial (317) 232-8229. Technical questions may be directed to Holly Stockram, Permit Review Section, Office of Air Quality through the toll free number or dial (317) 233-0865.